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Of Attorneys for Defendants

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
EUGENE DIVISION

NICOLE GILILLAND, an individual

No. 6:19-cv-00283-MK

Plaintiff,

vs.

SOUTHWESTERN OREGON  
COMMUNITY COLLEGE DISTRICT  
by and through its BOARD OF  
EDUCATION, an Oregon community  
college district and board;  
SOUTHWESTERN OREGON  
COMMUNITY COLLEGE, an Oregon  
community college; PATTY SCOTT,  
an individual; TIM DAILY, an individual;  
FRANCISCO SALDIVAR, an individual;  
SUSAN WALKER, an individual;  
MELISSA SPERRY, an individual;  
PAMELA WICK, an individual,

Defendants.

**DECLARATION OF LUKE REESE  
IN SUPPORT OF DEFENDANTS'  
MOTION TO STAY DEADLINES  
PENDING RULING ON  
PLAINTIFF'S ATTORNEY'S  
MOTION TO WITHDRAW**

I, Luke W. Reese, under penalty of perjury, do hereby declare and say:

1. I am the attorney of record for defendants and make this Declaration in support of Defendants' Motion to Stay Deadlines Pending Ruling on Plaintiff's Attorney's Motion to Withdraw.

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2. I attached true and correct copies of several emails received from plaintiff, Nicole Gililand, to my Declaration submitted in support of defendants' Response to Plaintiff's Attorney's Motion to Withdraw. Those emails, identified as ***Exhibit 1***, are incorporated here by reference.

3. Plaintiff has continued to send me direct email communications of the same nature and tone, despite my attempts to remind her that attorney Kevin Brague remains her counsel of record.

4. I do not believe that plaintiff recognizes Mr. Brague as her attorney at this time.

5. As a result, I have been unable to have the conferrals necessary to meet the existing case management deadlines.

I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR PERJURY.

DATED this 8th day of April 2020.

s/ Luke W. Reese

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Luke W. Reese, OSB No. 076129

Garrett Hemann Robertson P.C.

[lreese@ghrlawyers.com](mailto:lreese@ghrlawyers.com)

Of Attorneys for Defendants

### CERTIFICATE OF SERVICE

I hereby certify that I caused to be served the foregoing **Declaration of Luke Reese in Support of Defendants' Motion to Stay Deadlines Pending Ruling on Plaintiff's Attorney's Motion to Withdraw** on the date indicated below,

☒ Via First-Class Mail with postage prepaid  
☒ Via Electronic Filing  
☐ Via Facsimile Transmission  
☐ Via Hand Delivery  
☐ Via Overnight Delivery

to the following person(s) a true copy thereof, contained in a sealed envelope (if other than by facsimile transmission), addressed to said person(s) at their last known addresses indicated below:

Nicole Gililland  
PO Box 158  
51668 Blue River Drive, #4  
Blue River OR 97413  
Email: [nicolegililland15@gmail.com](mailto:nicolegililland15@gmail.com)  
Plaintiff *pro se*

KEVIN C. BRAGUE  
The Brague Law Firm  
1205 NW 25<sup>th</sup> Avenue  
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Attorney for Plaintiff

Nicole Gililland  
608 Grant Avenue, #19  
Ogden UT 84404  
Plaintiff *pro se*

DATED April 8, 2020.

GARRETT HEMANN ROBERTSON P.C.

*s/ Luke W. Reese*

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